

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. No. 11479
WILLIAM CARRICO
3 State Bar No. 003042
Assistant Federal Public Defender
4 411 E. Bonneville Avenue, Suite 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6

7 Attorneys for Anousone Savanh

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

* * *

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 vs.
14 ANOUSONE SAVANH,
15 Defendant.
16

2:14-cr-290-KJD-PAL

**STIPULATION TO MODIFY
CONDITIONS OF PRETRIAL RELEASE
(Second Request)**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United
18 States Attorney, and Allison Herr, Special Assistant United States Attorney, counsel for the United
19 States of America, and Rene L. Valladares, Federal Public Defender, and William Carrico, Assistant
20 Federal Public Defender, counsel for defendant ANOUSONE SAVANH, that the conditions of
21 pretrial release be modified. On March 21, 2014, this Court (Ferenbach, J.), ordered that Mr. Savanh
22 be released on his personal recognizance, under the supervision of Pretrial Services, with certain
23 special conditions. It is the Parties desire that the Court now modify those conditions to
24 accommodate a slight change to Mr. Savanh's circumstances. The Parties agree that it is appropriate
25 to modify the conditions in this way, so as to avoid an unnecessary hardship on innocent third
26 parties, while still meeting the requirement that Mr. Savanh continue to be monitored.

27 ///

28 ///

1 Among the conditions of pretrial supervision that would be effected, are the following:

2 1. That the defendant be allowed to transport his children to school between the hours
3 of 6:30 a.m. and 7:30 a.m. Additionally to pick the children from school between the hours of 1:00
4 p.m. and 3:00 p.m. The greater window of time is necessary in the afternoon, due to the fact that two
5 different schools have different dismissal times.

6 2. Mr. Savanh has proved to be reliable on supervision, while there have been new case
7 developments, which the Parties feel may alter the character of the litigation, but concerning which
8 further technical examination is necessary, and that the unanticipated delay cause by these
9 developments make it appropriate to alter some of the more onerous conditions effecting the
10 defendant's daily life, as it can be done while still meeting the requirement that Mr. Savanh continue
11 to be monitored.

12 3. The Parties have recently conferred regarding the modifications to the conditions of
13 release. It is now mutually agreed to by the Parties that they request the Court relax, and amend,
14 certain of the conditions of pretrial release conditions.

15 4. The Parties recommend these changes as appropriate in light of the circumstances,
16 while maintaining the primary aim of supervision, which is to address the degree of risk by the least
17 restrictive conditions necessary.

18 This is the second request to modify conditions filed herein.

19 DATED this 2nd day of September, 2015.

20
21 RENE L. VALLADARES
Federal Public Defender

DANIEL G. BOGDEN
United States of America

22 */s/ William Carrico*

/s/ Allison Herr

23 By: WILLIAM CARRICO
24 Assistant Federal Public Defender
Counsel for Defendant

By: ALLISON HERR
Special Assistant United States Attorney
Counsel for the Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

2:14-cr-290-KJD-PAL

Plaintiff,

FINDINGS OF FACT, CONCLUSIONS OF
LAW, AND ORDER

vs.

ANOUSONE SAVANH,

Defendant.

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. That the defendant be allowed to transport his children to school between the hours of 6:30 a.m. and 7:30 a.m. Additionally to pick the children from school between the hours of 1:00 p.m. and 3:00 p.m. The greater window of time is necessary in the afternoon, due to the fact that two different schools have different dismissal times.

2. Mr. Savanh has proved to be reliable on supervision, while there have been new case developments, which the Parties feel may alter the character of the litigation, but concerning which further technical examination is necessary, and that the unanticipated delay cause by these developments make it appropriate to alter some of the more onerous conditions effecting the defendant's daily life, as it can be done while still meeting the requirement that Mr. Savanh continue to be monitored.

3. The Parties have recently conferred regarding the modifications to the conditions of release. It is now mutually agreed to by the Parties that they request the Court relax, and amend, certain of the conditions of pretrial release conditions.

4. The Parties recommend these changes as appropriate in light of the circumstances, while maintaining the primary aim of supervision, which is to address the degree of risk by the least restrictive conditions necessary.

ORDER

IT IS FURTHER ORDERED that the conditions of pretrial release be modified to save and accept for the location monitor.

DATED 2nd day of September, 2015.



UNITED STATES MAGISTRATE JUDGE